

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA *ex. rel.*
LAURA LAPORTE, ANGELA DAVENPORT,
PAMELA HONE, ROBERT BIASSELLI,
KELLI J. AMAYA, AMANDA KENNY, and
DORIS MOODY,

Plaintiffs,

v.

PREMIER EDUCATION GROUP, L.P. and
PREMIER EDUCATION GROUP, G.P., INC.
d/b/a HARRIS SCHOOL OF BUSINESS,
BRANFORD HALL CAREER INSTITUTE,
SALTER COLLEGE, THE SALTER SCHOOL,
SEACOAST CAREER SCHOOLS, SUBURBAN
TECHNICAL SCHOOL; and JOHN DOES
NOS. 1-50, FICTITIOUS NAMES,

Defendants.

)
)
) Civil Action No.
) 1:11-CV-03523(RBK)(AMD)
)
)
) **NOTICE OF MOTION**
) **FOR CERTIFICATION OF**
) **INTERLOCUTORY**
) **APPEAL AND STAY**
) **PENDING APPEAL**
)
) **[FILED**
) **ELECTRONICALLY]**
)
) **ORAL ARGUMENT**
) **IS REQUESTED**
)
) **MOTION DAY:**
) **JUNE 20, 2016**
)

PLEASE TAKE NOTICE that the undersigned, on behalf of Defendants Premier Education Group, L.P. and Premier Education Group, G.P., Inc. (“Defendants”) will move before this Court on June 20, 2016 at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, before the Honorable Robert B. Kugler, United States District Judge of the United States District Court for the District of New Jersey, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for an Order granting Defendants’ motion for an Order: (i) pursuant to 28 U.S.C. §

1292(b) certifying an interlocutory appeal to the Third Circuit Court of Appeals of this Court's Opinion and Order entered on May 11, 2016, on the grounds that they involve a controlling question of law as to which there is substantial grounds for difference of opinion and that an immediate appeal from the Opinion and Order may materially advance the ultimate termination of the litigation; and (ii) staying further proceedings in this action pending appeal;

PLEASE TAKE FURTHER NOTICE that, in support of their motion, counsel for Defendants shall rely upon the attached Certification of Richard M. Howard, Esq. with exhibits annexed thereto, and upon their Memorandum of Law in Support of their Motion;

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, shall be served by June 5, 2016; and

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request that the Court hear oral argument on Defendants' Motion.

Dated: May 23, 2016

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By: s/ Richard M. Howard

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